

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

THERRAN RASHEED SMALLS,)	
)	
Plaintiff,)	C/A No.: 2:24-cv-01713-RMG-MGB
)	
v.)	
)	<u>DEFENDANTS' RESPONSES</u>
)	<u>TO LOCAL CIV. RULE 26.01</u>
OFFICER JELLICO, OFFICER ADAMS,)	<u>INTERROGATORIES</u>
OFFICER HENEGAN,)	
)	
Defendants.)	
)	

Defendants Officer Jellico, Officer Adams and Officer Henegan (collectively “Defendants”), by and through their undersigned counsel, hereby submits the following Responses to Local Civil Rule 26.01 (D.S.C.):

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Answer: None known.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

Answer: Plaintiff brings claims under 42 U.S.C. § 1983 which should be tried by a jury.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Answer: Not applicable.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

Answer: Plaintiff filed his *pro se* Complaint in the United States District Court for the District of South Carolina. The Charleston Division is appropriate as the allegations that give rise to this suit occurred in Charleston County.

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: None known at this time.

- (F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Answer: The complete and correct names of the defendants are Sean Jellico, Ryan Adams, and Colin Heneghan. If the filing of an amended summons and pleading is necessary, the undersigned will accept service of the same.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

Answer: None at this time.

CHANDLER & DUDGEON LLC

s/ Amanda K. Dudgeon

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Attorneys for Defendants

July 19, 2024

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

THERRAN RASHEED SMALLS,)	
)	C/A No.: 2:24-cv-01713-RMG-MGB
Plaintiff,)	
)	
v.)	
)	<u>CERTIFICATE OF SERVICE</u>
OFFICER JELLICO, OFFICER ADAMS,)	
OFFICER HENEGAN,)	
)	
Defendants.)	
_____)	

The undersigned hereby certifies that a true copy of the foregoing ***DEFENDANTS'***
RESPONSES TO LOCAL CIV. RULE 26.01 INTERROGATORIES was served this day, July
19, 2024, on plaintiff by depositing the same in the U.S. Mail at the address listed below:

VIA US MAIL

Therran R. Smalls #001224504
Sheriff Al Cannon Detention Center
3841 Leeds Avenue
North Charleston, SC 29405

CHANDLER & DUDGEON LLC

s/ Amanda K. Dudgeon
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